

EXHIBIT 34

From: [Burke, William](#)
To: [Ivy Arai Tabbara](#)
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Subject: Schedule for Sheetmetal and Plumbers
Date: Tuesday, November 29, 2016 1:43:00 PM
Attachments: [Sheet Metal & Plumbers Proposed Schedule.pdf](#)

Ivy:

Attached please find a chart regarding the schedule for Sheetmetal and Plumbers. As you can see, we have accepted all but one of the modifications that Plaintiffs proposed to the schedule during our Rule 26(f) conference.

The one date that the parties have not yet agreed on is the date for amending the pleadings. We initially proposed February 1, 2017. Plaintiffs counter-proposed April 3, 2017 to allow for more time to review CVS's document production before deciding whether to add parties. We are concerned, however, that if Plaintiffs add new parties on April 3, 2017 we won't have sufficient time to obtain discovery from the additional parties before the class certification briefing begins in June 2017. We propose to split the difference and make the deadline for amending pleadings March 3, 2017. Please let us know if that compromise is acceptable.

Thanks,
Bill

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Proposed Schedule:**Sheet Metal Workers Local No. 20 Welfare and Benefit Fund and Indiana Carpenters Welfare Fund v. CVS Health Corporation, Case No. 1:16-cv-00046-S (D.R.I.)****Plumbers Welfare Fund, Local 130 U.A. v. CVS Health Corporation, Case No. 1:16-cv-0447-S (D.R.I.)**

Event*	CVS's Proposal	Plaintiff's Response	CVS's Counter-Proposal**
Initial disclosures due	December 2, 2016	December 9, 2016	December 9, 2016
Amended pleadings and joinder of parties due	February 1, 2017	April 3, 2017	March 3, 2017
Plaintiffs' motion for class certification due	June 2, 2017	June 2, 2017	June 2, 2017
Defendant's opposition to class certification due	July 14, 2017	July 14, 2017	July 14, 2017
Plaintiffs' reply in support of class certification due	August 11, 2017	August 11, 2017	August 11, 2017
Close of all fact discovery	December 15, 2017	December 15, 2017	December 15, 2017
Plaintiffs' expert reports due	January 31, 2018	60 days after the later of (1) decision re: class certification or (2) the close of discovery	60 days after the later of (1) decision re: class certification or (2) the close of discovery
Defendant's expert reports due	February 28, 2018	30 days after plaintiffs' expert reports	30 days after plaintiffs' expert reports
Plaintiffs' rebuttal expert reports due	March 28, 2018	30 days after CVS's reports	30 days after CVS's reports
Motions for summary judgment due	April 25, 2018	April 25, 2018	April 25, 2018
Oppositions to summary judgment due	May 23, 2018	May 23, 2018	May 23, 2018
Replies in support of summary judgment due	June 6, 2018	June 6, 2018	June 6, 2018

*We will propose that all events after the close of summary judgment briefing—pre-trial conference, pre-trial motions, including Daubert motions, trial date—be scheduled at a later date by the Court.

** Dates in red have not yet been agreed-to.